

U.S. Appln. No. 09/941,301
Amendment Dated Aug. 22, 2005
Reply to Final Office Action of June 21, 2005
Docket No. BOC9-2001-0022 (266)

REMARKS

These remarks are made in response to the final Office Action of June 21, 2005 (Office Action). As this response is timely filed within the three-month statutory period, no fee is believed due.

In paragraphs 2-3 of the Office Action, Claims 1, 2, 5, 9-12, 15 and 21-23 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,924,068 to Richard, et al. (hereinafter Richard). In paragraph 5 of the Office Action, Claims 3, 13, and 24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Richard in view of U.S. Patent No. 6,141,642 to Oh (hereinafter Oh). In paragraph 6, Claims 4, 6-8, 14, 16-19, 25-26, 28-36 and 38-43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Richard in view of U.S. Patent No. 6,600,814 to Carter, *et al.* (hereinafter Carter). Claims 27 and 37 were rejected in paragraph 7 under 35 U.S.C. § 103(a) as being unpatentable over Richard in view of Carter and in further view of Oh.

Claims 1, 11, 19, 21, 25, 35, and 43 have each been amended to further emphasize certain aspects of Applicants' invention. The amendments, as described herein, are supported by the Specification. (See, e.g., p. 7, lines 3-11; p. 8, lines 2-12, and 24-28; p. 9, lines 13-23; and p. 11, lines 23-28.) No new matter has been added by virtue of the amendments.

I. Applicants' Invention

It may be useful to reiterate certain aspects of Applicants' invention prior to addressing the cited references. One aspect of the invention is a text-to-speech (TTS) memory cache that works in conjunction with a TTS system having one or more TTS engines (page 4, lines 25-27). If entries are found in the TTS cache that correspond to received text, for example, stored spoken output can be utilized rather than requiring the TTS engine to construct spoken output.

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II. The Claims Define Over The Prior Art

As already noted, Claims 1, 2, 5, 9-12, 15, and 21-23 were rejected as being anticipated by Richard. Richard is directed to an electronic news receiving device. The device receives text data for an electronic edition of a newspaper and subsequently produces an audible rendering of the newspaper to a user. (Col. 1, lines 38-41; Abstract.) Richard discloses front-end processing of received text, the front-end processing generating processed input. (See, e.g., Col. 13, lines 3 – 49.) Richard also discloses back-end processing by which the processed input is used to "synthesize speech sounds." (See, e.g., Col. 13, line 50 – Col. 14, line 61.)

Richard does not explicitly address memory caches, and Richard does not disclose a comparison of processed input to an entry in a text-to-speech cache memory, as recited in Claims 1, 11, 19, 21, 25, 35, and 43, as amended. It follows that Richard does not expressly or inherently teach a comparison to ascertain an entry in a memory cache that specifies spoken output corresponding to received text, as also recited in each of the amended claims.

In a portion cited in the Office Action, Richard discloses only that processed text that does not fit "standard pronunciation rules" is marked with a "pronunciation flag" so that when a word marked with a pronunciation flag is encountered, the word and corresponding pronunciation data indicated by the flag are stored in "a temporary memory" of a "dictionary module." (Col. 13, line 65 – Col. 14, line 5.) The identification of words that do not fit standard pronunciation rules and the storing of such a word along with pronunciation data, however, have nothing to do with performing a comparison of text to an entry specifying stored spoken output, as recited in each of the claims.

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Applicants' invention provides a comparison and matching that can obviate the need to perform backend processing. Instead, once text is matched to an entry, Applicants' invention provides spoken output without additional processing. Richard, by contrast, merely provides pronunciation data that assists in the generation of speech; the provision of pronunciation data does not obviate the need for additional processing to generate speech output. It follows that Richard fails to expressly or inherently teach this feature recited in Claims 1, 11, 19, 21, 25, 35, and 43, as amended.

Carter is cited against other claims, but it is worthwhile to discuss the reference in connection with amended Claims 1, 11, 19, 21, 25, 35, and 43. Carter is addressed to a messaging system that stores e-mail messages and converts them to speech for playback to a user via a telephone handset. (Col. 2, lines 25-39; Col. 3, lines 50-67; Abstract.) Carter addresses both caching and the playback of stored spoken output, but Carter does not disclose each of the features recited in the amended claims.

Carter does not disclose, for example, that a memory cache contains a spoken output specified by entries that can be compared to received text. Carter discloses only that a cache can contain text segments culled from an e-mail. Depending on the size of a segment, a segment that may be reused during playback can be stored in the cache according to Carter. Caching in Carter pertains only to segments of e-mail messages. Carter fails to expressly or inherently teach that received text input can be compared to entries of a memory cache, the entries specifying spoke output corresponding to the received text input.

Moreover, Carter like Richards fails to disclose that the text input is received with corresponding attributes, as recited in each of Claims 1, 11, 19, 21, 25, 35, and 43. Both references similarly fail to disclose that such attributes specify stress, gender, grammar, speed, and volume for an audio rendering of the associated text input. In failing to

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disclose such attributes, the references further fail to disclose that such attributes are stored along with spoken output in a cache memory. Both references thus also fail to disclose that spoken output is rendered according to these attributes associated with a received text input, as recited in each of the amended claims. Oh, which is cited in the Office Action as disclosing the use of multiple text-to-speech engines, also fails to expressly or inherently teach any of these features.

Each of the references also fail to disclose a cache memory in which callback information is stored, as recited in each of Claims 1, 11, 19, 25, 35, and 43, as amended. As recited in each of these claims, the cache-stored callback information is used in generating a visual display of received text, the display coinciding with the spoken output generated for the text. More particularly, the call back information is used to coordinate a visual and audible rendering of the text so that each word of in the display is successively highlighted in coordination with an audible rendering of the word. These features also are not disclosed in any of the cited references.

Applicants respectfully assert that none of the references teach or suggest every feature of independent Claims 1, 11, 19, 21, 25, 35, and 43, as amended, and that therefore each of the claims defines over the prior art. Applicants further respectfully assert that in as much as each of the remaining claims depends from one of the amended independent claims while reciting additional features, these claims likewise define over the prior art.

CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the

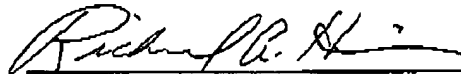
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Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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